

REMARKS/ARGUMENTS

This paper is responsive to the Office Action mailed February 19, 2010. Claims 1, 2, 4, 6-14, 16-21, 35, and 36 were pending before submission of this paper. Claims 1, 2, 4, 6-14, 16-21, 35, and 36 stand rejected. Specifically, claims 1,2,4-14, 16-21, and 36 stand rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. Specifically, claims 1, 2, 4, 6-14, 16-21, 35, and 36 stand rejected under 35 U.S.C. § 112, as allegedly being indefinite for failing to particularly point out and distinctly claim the subject matter which the applicant regards as the invention. Specifically, claims 1, 2, 4, and 6-8 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Calabria *et al.* (US 2005/0137939) (hereinafter "Calabria"). Specifically, claims 9-14, 16-21, 35 and 36 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Calabria in view of Harik (US 2005/0065806)(hereinafter "Harik"). Applicants respectfully disagree. Claims 1, 6, 9-14, 16, 20, 35, and 36 have been amended. Support for all amended claims can be found in the specification, and no new matter has been added by these amendments. Reconsideration of the claims in view of the amendments and the following remarks is respectfully requested.

I. Examiner Interview

A telephone interview was conducted with Examiner Yehdega Retta on April 8, 2010 at 3:00 PM Eastern Time. The undersigned attorney represented Applicants in the interview. In the interview, the rejections under 35 U.S.C. §§ 101, 112, and 103 were discussed in detail. Agreement with respect to the rejections under 35 U.S.C. §§ 101 and 112 was reached. No agreement with respect to the rejection under 35 U.S.C. § 103 was reached, although Examiner Retta was unable to identify in the cited Calabria where certain elements of claim 1 are taught. Examiner Retta indicated that she did not give due consideration to several elements recited in the claim because she found the claims to be confusing as recited. Examiner Retta did, however, agree that the proposed amendments addressing the rejections under 35 U.S.C. § 112 resolves any alleged confusion and would result in full consideration of all elements of the claims. Applicants appreciate Examiner Retta's indication that she will give the claims full consideration upon filing the proposed amendment and present this response accordingly.

II. Claims 1, 2, 4-14, 16-21, and 36 Define Patentable Subject Matter Under 35 U.S.C. § 101

Claims 1-2, 4-14, 16-21, and 36 stand rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter.

With respect to claims 1-2 and 4-8, Examiner Retta agreed during the aforementioned interview that amending claim 1 to recite that “one or more computer systems...collectively implement at least” the recited plurality of advertisement generators, fee calculator, and advertisement manager overcomes the rejection of the claim under 35 U.S.C. § 101. As Applicants have amended claim 1 accordingly, Applicants respectfully request withdrawal of the rejection of claim 1 under 35 U.S.C. § 101. Claims 2 and 4-8 depend from claim 1 and, therefore, inherit the amendment of claim 1 through dependency. Accordingly, Applicants respectfully submit that claims 2 and 4-8 are allowable under 35 U.S.C. § 101 and request withdrawal of the rejection of these claims accordingly.

With respect to claims 9-14, 16-21, and 36, Examiner Retta agreed during the aforementioned interview that amending claim 9 to recite that elements of the claim are performed “under the control of one or more computer systems configured with executable instructions” overcomes the rejection of claim 9 under 35 U.S.C. § 101. As Applicants have amended claim 9 accordingly, Applicants respectfully request withdrawal of the rejection of claim 9 under 35 U.S.C. § 101. Claims 9-14, 16-21, and 36 depend from claim 9 and, therefore, inherit the amendment of claim 9 through dependency. Accordingly, Applicants respectfully submit that claims 9-14, 16-21, and 36 are allowable under 35 U.S.C. § 101 and request withdrawal of the rejection of these claims accordingly.

III. Claims 1, 2, 4, 6-14, 16-21, 35, and 36 Comply With 35 U.S.C. § 112, Second Paragraph

Claims 1, 2, 4, 6-14, 16-21, 35 and 36 stand rejected under 35 U.S.C. 112, second paragraph, as allegedly being indefinite for allegedly failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

During the aforementioned interview, Applicants requested clarification of the rejections under 35 U.S.C. § 112. Examiner Retta explained that she found the claims confusing due to the order in which elements in the claim were recited. Examiner Retta agreed that the first basis of rejection of claim 9 under 35 U.S.C. § 112 was in error and that amending independent claims 1, 9, and 35 to recite elements in a different order would resolve any issues under the statute. Applicants have amended claims 1, 9 and 35 according to Examiner Retta's suggestion and have made additional clarifying amendments. Consequently, Applicants respectfully submit that all issues prompting the rejections under 35 U.S.C. § 112 have been addressed. Applicants respectfully request withdrawal of the rejections accordingly.

IV. Claims 1, 2, 4, and 6-8 Are Allowable Under 35 U.S.C. § 103 Over Calabria.

Claims 1-2, 4 and 6-8 stand rejected under 35 U.S.C. § 103(a) as allegedly being obvious over Calabria. However, with regard to rejections under 35 U.S.C. § 103, the Examiner must provide evidence which as a whole shows that the legal determination sought to be proved (*i.e.*, the reference teachings establish a *prima facie* case of obviousness) is more probable than not. M.P.E.P. § 2142. Accordingly, "the key to supporting any rejection under 35 U.S.C. § 103 is the clear articulation of the reason(s) why the claimed invention would have been obvious." M.P.E.P. § 2142; *see KSR International Co. v. Teleflex, Inc.*, 550 U.S.398, 82 USPQ 2d 1385, 1395-97 (2007).

As shown below, the rejection of each claim 1-2, 4 and 6-8 under 35 U.S.C. § 103(a) in the Office Action is deficient in one or more of these respects and therefore fails to establish a *prima facie* case of obviousness. Each claim 1-2, 4 and 6-8 is therefore allowable under 35 U.S.C. § 103 for at least this reason. Accordingly, Applicants request that the rejection of each claim 1-2, 4 and 6-8 under 35 U.S.C. § 103 be withdrawn.

A. Independent Claim 1

Applicants' claim 1, as amended, recites:

1. A computer system for requesting advertisements to be placed along with content on behalf of an advertiser in association with at least one keyword, comprising:

one or more computer systems that collectively implement at least:

a plurality of advertisement generators that each use at least one algorithm to identify search terms corresponding to an item, determine at least one item-specific visual element, create a link to information about the item, and generate an advertisement set for the item that includes at least one associated advertisement having the item-specific visual element, the link, and at least one search term matching the at least one keyword;

a fee calculator that at least calculates fee amounts for each of the advertisement sets generated by the advertisement generators based at least in part on anticipated profitability of the advertisement sets;

an advertisement manager that, at least:

receives from the advertisement generators advertisement sets,

receives from the fee calculator a fee amount for each of the generated advertisement sets,

determines whether an advertisement set is currently submitted to an advertisement placement service for a set of keywords including the at least one keyword,

when an advertisement set is not currently submitted to the advertisement placement service for the set of keywords, selects one of the generated advertisement sets for submission to the advertisement placement service; and

when an advertisement set is currently submitted to the advertisement placement service for the set of keywords, determines whether at least one of the generated advertisement sets would avoid conflict with the submitted advertisement set with respect to the at least one search term of the submitted advertisement set and, when at least one of the generated advertisement sets is determined to avoid conflict, selects one of the generated advertisement sets determined to avoid conflict; and

an advertisement submitter that, when an advertisement set is not currently submitted to the advertisement placement service for the set of keywords at least:

receives from the advertisement manager the selected advertisement set and the fee amount for the selected advertisement set, and

sends to the advertisement placement service a request to place the selected advertisement set along with content associated with the keyword at the fee amount of the selected advertisement set.

Such subject matter as recited by amended claim 1 is not disclosed, taught, suggested or otherwise rendered obvious under 35 U.S.C. § 103 by Calabria. For example, claim 1 recites an “advertisement manager” that performs several functions including determining “whether an advertisement set is currently submitted to an advertisement placement service for a set of keywords including the at least one keyword [for which advertisements are requested to be placed].” The “advertisement manager” recited by claim 1 “selects one of the generated advertisement sets for submission to the advertisement placement service” when “an advertisement set is not currently submitted to the advertisement placement service for the set of keywords.” When “an advertisement set is currently submitted to the advertisement placement service for the set of keywords,” the advertisement manager recited by claim 1 “determines whether at least one of the generated advertisement sets would avoid conflict with the submitted advertisement set with respect to the at least one search term of the submitted advertisement set.” Further, “when at least one of the generated advertisement sets is determined to avoid conflict,” the advertisement manager “selects one of the generated advertisement sets determined to avoid conflict” and the selected advertisement set is received by an “advertisement submitter.” Applicants respectfully note that, while claim 1 has been amended for the purpose of making the claim easier to read, much of this subject matter was recited prior to the present amendment.

The Office Action cites Calabria, paragraphs 35-40, 44-47 and 109, as allegedly teaching the “advertisement manager” recited by independent claim 1 prior to the present amendment. However, these paragraphs of Calabria have several shortcomings in this respect. For example, claim 1 recites that the “advertisement manager... selects one of the generated advertisement sets for submission to the advertisement placement service” when “an advertisement set is not currently submitted to the advertisement placement service for the set of keywords.” However, “when an advertisement set is currently submitted to the advertisement placement service for the set of keywords” the “advertisement manager” of claim 1 “determines whether at least one of the generated advertisement sets would avoid conflict with the submitted advertisement set with respect to the at least one search term of the submitted advertisement set.”

On a general level, Calabria nowhere in paragraphs 35-40, 44-47 and 109 discloses anything that acts one way “when an advertisement set is not currently submitted to the advertisement placement service for the set of keywords” and acts another way “when an advertisement set is currently submitted to the advertisement placement service for the set of keywords,” as recited in claim 1. On the contrary, Calabria at these paragraphs merely describes various components of “a keyword searching environment 10 where bids by one advertiser may elicit a change in bidding strategy of other bidders” (Calabria, ¶ 35) such as a “content selection logic process 28 [that] selects the appropriate keyword advertisements from the sponsored results database 34, as well as other appropriate content for keyword search results list from the other results database 36 and other content database 38” (Calabria, ¶ 39). Thus, Calabria does not disclose, teach, or suggest every feature of independent claim 1 at least for the above reasons.

Furthermore, claim 1 also recites that the “advertisement manager...determines whether at least one of the generated advertisement sets would avoid conflict with the submitted advertisement set with respect to the at least one search term of the submitted advertisement set.” When it is determined that an advertisement set would avoid conflict, the “advertisement manager... selects one of the generated advertisement sets determined to avoid conflict.” Calabria generally does not teach that “generated advertisement sets would avoid conflict with the submitted advertisement set” and so cannot teach an “advertisement manager...[that] selects one of the generated advertisement sets determined to avoid conflict” when “at least one of the generated advertisement sets is determined to avoid conflict.” Therefore, Calabria fails to disclose, teach, or suggest every feature of independent claim 1 at least for the above additional reasons.

In addition to the foregoing, Applicants respectfully submit that the Office Actions rejection of claim 1 under 35 U.S.C. § 103 is deficient for at least some additional reasons. As an example, on page 5, the Office Action acknowledges that “Calabria does not teach explicitly...determining if an advertisement set is currently submitted or not, but it would have been obvious to one of ordinary skill in the art at the time of the invention to know that it would be determined if there is already submitted advertisement set or not.” The reasoning provided on pages 5 and 6 is that “one [with ordinary skill in the art at the time of the invention]

would be motivated to either submit only one advertisement set at a time or to indicate which advertisement set to be submitted to the search engine, if more than one can be submitted, so that the search engine knows which advertisement to select.” Applicants respectfully submit that this reasoning is deficient for the purposes of a rejection under 35 U.S.C. § 103 for several reasons.

For example, Applicants respectfully submit that the reasoning in the Office Action consists of impermissible hindsight. Specifically, Applicants respectfully point out that “impermissible hindsight must be avoided and the legal conclusion must be reached on the basis of the facts gleaned from the prior art.” M.P.E.P. § 2412. While “any judgment on obviousness is in a sense necessarily a reconstruction based on hindsight reasoning,” such a judgment is proper only if it “takes into account only knowledge which was within the level of ordinary skill in the art at the time the claimed invention was made and does not include knowledge gleaned only from applicant’s disclosure.” M.P.E.P. § 2145(X)(A). In the present instance, the Office Action merely makes the conclusory statement that “one [with ordinary skill in the art at the time of the invention] would be motivated to either submit only one advertisement set at a time or to indicate which advertisement set to be submitted to the search engine, if more than one can be submitted, so that the search engine knows which advertisement to select.” The Office Action fails to articulate any consideration of knowledge within the level of ordinary skill in the art, therefore, is deficient for at least this reason.

Additionally, even assuming *arguendo* that “determining if an advertisement set is currently submitted or not” by itself would have been obvious to one with ordinary skill in the art, claim 1 recites actions based at least in part on this determination such as “select[ing] one of the generated advertisement sets for submission to the advertisement placement service” and “determine[ing] whether at least one of the generated advertisement sets would avoid conflict with the submitted advertisement set with respect to the at least one search term of the submitted advertisement set.” As discussed above, such subject matter is not disclosed, taught, or suggested by Calabria and, therefore, even assuming *arguendo* that “determining if an advertisement set is currently submitted or not” was obvious under 35 U.S.C. § 103, obviousness of this element would not render the claim as a whole obvious under the statute.

As another example of the Office Action's failure to make a proper rejection under 35 U.S.C. § 103, in the Response to Arguments section on page 10 does not sufficiently address arguments made by Applicants in the Request for Continued Examination (RCE) filed January 29, 2010. Applicants respectfully point out that "in order to provide a complete application file history and to enhance the clarity of the prosecution history record, an examiner must provide clear explanations of all actions taken by the examiner during prosecution of an application." M.P.E.P. § 707.07(f). Further, "where the applicant traverses any rejection, the examiner should, if he or she repeats the rejection, take note of the applicant's argument and answer the substance of it." *Id.* Applicants respectfully submit that the Office Action fails to meet its burden in this respect.

For instance, in the remarks filed with the RCE, Applicant argued several features of the "advertisement manager" recited by claim 1 which, although phrased differently for the sake of clarity, appear in amended claim 1. In response, the Office Action on page 10 merely alleges that "it is unclear [if] it is determined that an advertisement set is currently submitted how the generated advertisement set are [sic] selected to avoid conflict because if it is selected either it create [sic] conflict or not but can not avoid conflict by selecting the generated advertisement set" and "it is not clear if the generated advertisement set is not submitted because it creates conflict."

Applicants respectfully submit that an alleged lack of clarity in the claims is not a proper basis for a rejection under 35 U.S.C. § 103. Specifically, "a claim limitation which is considered indefinite cannot be disregarded" and "if a claim is subject to more than one interpretation, at least one of which would render the claim unpatentable over the prior art, the examiner should reject the claim as indefinite under 35 U.S.C. § 112, second paragraph (see M.P.E.P. § 706.03(d)) and should reject the claim over the prior art based on the interpretation of the claim that renders the prior art applicable." M.P.E.P. § 2143.03(I) (emphasis in original). In other words, "if no reasonably definite meaning can be ascribed to certain claim language, the claim is indefinite, not obvious." *Id.* Applicants respectfully note that M.P.E.P. §§ 2142-2144 provide detailed reasons for when claims may be considered obvious under 35 U.S.C. § 103, none of which include a lack of clarity in language recited by a claim.

In this case, Applicant respectfully submits that claim 1 as presented with the RCE did not lack clarity. Indeed, Applicants, in the Remarks section, provided a clear, concise narrative describing at least some of the elements that Calabria does not disclose, teach, or suggest. Thus, even assuming *arguendo* that there was a deficiency in the phrasing of one or more elements of the claim, Applicants' narrative provided a clear explanation that could be used when considering the cited art. Further, even assuming *arguendo* that there was a lack of clarity in claim 1, for at least the above reasons, such a lack of clarity would not provide a basis for a rejection under 35 U.S.C. § 103. Therefore, for at least the above reasons, Applicants respectfully submit that the Office Action has not yet made a proper rejection of claim 1 under 35 U.S.C. § 103.

In light of the foregoing comments and amendments, Applicants respectfully submit that claim 1 is allowable under 35 U.S.C. § 103 over Calabria and request that the rejection be withdrawn.

B. Dependent Claims 2, 4 and 6-8

Claims 2, 4 and 6-8 depend from independent claim 1 and are therefore allowable at least for depending from an allowable claim. Furthermore, it is submitted that at least some of claims 2, 4 and 6-8 independently recite patentable subject matter. For example, claim 4 recites that "the advertisement manager selects one of the generated advertisement sets based at least in part on a determined likelihood of users selecting the advertisement of the advertisement set when the advertisement is placed along with the content associated with the keyword." At least for reasons discussed above, Calabria does not teach the "advertisement manager" recited by claim 1 and, therefore, does not teach that "the advertisement manager selects one of the generated advertisement sets based at least in part on a determined likelihood of users selecting the advertisement of the advertisement set when the advertisement is placed along with the content associated with the keyword." Applicants reserve, without prejudice, the right to provide additional reasons at a later date.

V. Claims 9-14, 16-21, and 35 Are Allowable Under 35 U.S.C. § 103 Over Calabria In View Of Harik

Claims 9-14, 16-21, and 35 stand rejected under 35 U.S.C. § 103(a) as allegedly being obvious over Calabria in view of Harik. However, as shown below, the rejection of each claim 9-14, 16-21 and 35 under 35 U.S.C. § 103(a) in the Office Action fails to establish a prima facie case of obviousness. Each claim 9-14, 16-21 and 35 is therefore allowable under 35 U.S.C. § 103 for at least this reason. Accordingly, Applicant requests that the rejection of each claim 9-14, 16-21 and 35 under 35 U.S.C. § 103 be withdrawn.

A. Independent Claim 9

As amended, independent claim 9 recites:

9. A method in a computer system for placing advertisements for an advertiser offering an item for consumption, the method comprising:
under the control of one or more computer systems configured with executable instructions,
using each of a plurality of different algorithms to at least:
identify search terms corresponding to the item;
determine at least one item-specific visual element;
create a link to information about the item; and
generate an advertisement set for the item that each include at least one associated advertisement having the item-specific visual element, the link, and one or more of the identified search terms;
submitting one or more of the generated advertisement sets to an advertisement placement service with a bid amount;
determining whether at least one of the generated advertisement sets would avoid conflict with the submitted one or more advertisement sets with respect to the at least one search term of the submitted one or more advertisement sets;
when at least one of the generated advertisement sets is determined to avoid conflict:
selecting, based at least in part on the identified search terms of the submitted one or more advertisement sets, an unsubmitted advertisement set that avoids conflict with the submitted one or more advertisement sets; and
submitting the selected unsubmitted advertisement set to the advertisement placement service.

Applicants respectfully submit that claim 9 is allowable at least for reasons including some of those discussed above in connection with claim 1. For example, claim 9 recites a method that includes “determining whether at least one of the generated advertisement sets would avoid conflict with the submitted one or more advertisement sets with respect to the at least one search term of the submitted one or more advertisement sets.” “When at least one of the generated advertisement sets is determined to avoid conflict,” claim 9 recites that the method includes “selecting, based at least in part on the identified search terms of the submitted one or more advertisement sets, an unsubmitted advertisement set that avoids conflict with the submitted one or more advertisement sets” and “submitting the selected unsubmitted advertisement set to the advertisement placement service.” For at least reasons including some of those discussed above, Applicants respectfully submit that Calabria does not disclose, teach, or suggest at least such subject matter.

The Harik reference is not cited as teaching, disclosing, or suggesting, and in fact nowhere teaches, discloses, or suggests, such subject matter as recited by independent claim 9. Hence also Harik is deficient in at least this respect, and thus does not make up for the deficiencies in Calabria with respect to claim 9. Consequently, the proposed combination of Calabria and Harik does not teach or suggest each and every feature of independent claim 9 for at least the above reasons. Thus the standing rejection of unamended claim 9 fails to establish a *prima facie* case of obviousness with respect to independent claim 9 as amended. Accordingly, Applicants request that the rejection of claim 9 under 35 U.S.C. § 103 be withdrawn.

B. Dependent Claims 10-14 and 16-21

Claims 10-14 and 16-21 depend from independent claim 9 and are therefore allowable at least for depending from an allowable claim. Furthermore, it is submitted that at least some of claims 10-14 and 16-21 independently recite patentable subject matter. Additional reasons for the patentability of the dependent claims 10-14 and 16-21 exist for at least this reason, and Applicants reserve, without prejudice, the right to provide these reasons at a later date.

C. Independent Claim 35

As amended, independent claim 35 recites:

35. A computer program product embedded in a computer-readable medium and including processor-executable instructions for placing advertisements, comprising:

- program code for using a plurality of different algorithms to:
 - identify search terms corresponding to the item;
 - determine at least one item-specific visual element;
 - create a link to information about the item;
 - generate an advertisement set for the item that each include at least one associated advertisement having the item-specific visual element, the link, and at least one search term of the identified search terms;
- program code for associating each generated advertisement set with a corresponding bid amount;
- program code for determining whether an advertisement set is currently submitted for the search terms included in the generated advertisement sets;
- program code for, when an advertisement set is not currently submitted for the search terms included in the generated advertisement sets, submitting a request specifying a selected advertisement set for the set of keywords;
- program code for, when one or more advertisement sets are currently submitted for at least one search term included with at least one corresponding generated advertisement set:
 - determining whether one or more unsubmitted generated advertisement sets would avoid conflict with the one or more currently submitted advertisement sets with respect to the at least one search term of the one or more currently submitted advertisement sets; and
 - when one or more of the generated advertisement sets is determined to avoid conflict:
 - selecting one of the unsubmitted generated advertisement sets determined to avoid conflict; and
 - submitting the selected one or more unsubmitted generated advertisement sets determined to avoid conflict.

Applicants respectfully submit that claim 35 is allowable at least for reasons including some of those discussed above in connection with claims 1 and 9. For example, claim 35 recites a computer program product that includes “program code for determining whether an advertisement set is currently submitted for the search terms included in the generated advertisement sets” and “program code for, when an advertisement set is not currently submitted

for the search terms included in the generated advertisement sets, submitting a request specifying a selected advertisement set for the set of keywords.” Furthermore, claim 35 recites “program code for, when one or more advertisement sets are currently submitted for at least one search term included with at least one corresponding generated advertisement set,” performing several actions. These actions include “determining whether one or more unsubmitted generated advertisement sets would avoid conflict with the one or more currently submitted advertisement sets with respect to the at least one search term of the one or more currently submitted advertisement sets.” Also, “when one or more of the generated advertisement sets is determined to avoid conflict” the actions include “selecting one of the unsubmitted generated advertisement sets determined to avoid conflict” and “submitting the selected one or more unsubmitted generated advertisement sets determined to avoid conflict.”

At least for reasons including some of those discussed above in connection with claims 1 and 9, Calabria does not disclose, teach, or suggest such subject matter as recited by amended claim 35. Also for reasons discussed above, Harik does not make up for this deficiency. Thus, the proposed combination of Calabria and Harik does not teach or suggest each and every feature of independent claim 35 for at least the above reasons. Thus the standing rejection of unamended claim 35 fails to establish a *prima facie* case of obviousness with respect to independent claim 35 as amended. Accordingly, Applicants request that the rejection of claim 35 under 35 U.S.C. § 103 be withdrawn.

VI. Amendment To The Claims

Unless otherwise specified or addressed in the remarks section, amendments to the claims are made for purposes of clarity, and are not intended to alter the scope of the claims or limit any equivalents thereof. The amendments are supported by the specification and do not add new matter. In addition, by focusing on specific claims and claim elements in the discussion above, Applicants do not imply that other claim elements are disclosed or suggested by the references. In addition, any characterizations of claims and/or cited art are being made to facilitate expeditious prosecution of this application. Applicants reserve the right to pursue at a later date any other broader or narrower claims that capture any subject matter supported by the

present disclosure, including subject matter found to be specifically disclaimed herein or by another prosecution. Accordingly, reviewers of this or any child or related prosecution history shall not reasonably infer that Applicants have made any disclaimers or disavowals of any subject matter supported by the present disclosure.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 206-467-9600.

Respectfully submitted,

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